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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**LEHMAN BROTHERS HOLDINGS INC.,
et al.,**

Debtors.

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Chapter 11

Case No. 08-13555 (SCC)

APPELLEE’S DESIGNATION OF

ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Federal Rule of Bankruptcy Procedure 8009, Lehman Brothers Holdings Inc. (“**Appellee**”) hereby submits its designation of additional items to be included in the record on appeal in connection with appellant Rex Wu’s (“**Appellant**”) appeal from an order (Case No. 08-13555, ECF No. 59801) entered by this Court (Hon. Shelly C. Chapman), which adjudicated and denied Appellant’s *Motion for an Order Enforcing the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for Purposes of Distributions* and overruled *Related Objections to the Timing of the Eighteenth Distribution* (Case No. 08-13555, ECF No. 59614). The Appellee does not re-designate any items that it may rely upon that have already been designated by the Appellant in its designation of record (Case No. 08-13555, ECF No. 61493) but, rather, will rely on the Appellant’s designations. For the avoidance of doubt, for the filings designated by either the Appellee or the Appellant, the Appellee

treats the designations as including *all* exhibits and attachments to such filings, whether listed or not by either the Appellee or the Appellant. Moreover, while the Appellee does not, at this time, object to any items designated by the Appellant, the Appellee does not concede the relevance of any such items.

**DESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL:**

<i>In re Lehman Brothers Holdings Inc., et al., United States Bankruptcy Court for the Southern District of New York (08-13555 (SCC))</i>			
Item No.	Document	ECF No.	Date
1.	Transcript of Hearing held on March 13, 2019 regarding Joint Liquidators Motion for an Order Enforcing the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for Purposes of Distributions	59682	March 15, 2019
2.	Debtor's Motion for Objection to Claim(s) / The Plan Administrators Objection to Certain Amended Claims (Reduce and Disallow Claims)	59622	April 16, 2019
3.	Motion to Approve / Notice of Presentment of Motion of Plan Administrator for an Order in Aid of Execution of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors	59756	June 7, 2019
4.	Debtor's Motion for Omnibus Objection to Claim(s) / Debtors Two Hundred and Eighteenth Omnibus Objection to Disallow and Expunge Certain Filed Proofs of Claim	20107	September 16, 2011
5.	Response to Debtors Two Hundred and Eighteenth Omnibus Objection to Disallow and	21541	October 24, 2011

<i>In re Lehman Brothers Holdings Inc., et al., United States Bankruptcy Court for the Southern District of New York (08-13555 (SCC))</i>			
	Expunge Certain Filed Proofs of Claim		
6.	Response to Debtors Two Hundred and Eighteenth Omnibus Objection to Disallow and Expunge Certain Filed Proofs of Claim	22414	November 10, 2011
7.	Response to Debtors Two Hundred and Eighteenth Omnibus Objection to Disallow and Expunge Certain, In re: Claim No. 44972	22630	November 16, 2011
8.	Order Granting Debtors Two Hundred Eighteenth Omnibus Objection to Disallow and Expunge Certain Claims	23049	December 7, 2011
9.	Transcript of Hearing Regarding Debtors' Two Hundred Eighteenth Omnibus Objection to Disallow and Expunge Certain Filed Proofs of Claim Solely as to Certain Claims		April 26, 2012
10.	Supplemental Order Granting Debtors Two Hundred Eighteenth Omnibus Objection to Disallow and Expunge Certain Claims	27630	April 27, 2012
11.	Plan Administrator's Objection to Motion for Reconsideration and Related Filings (related document(s)[61168], [61173], [61172], [61180])	61194	August 4, 2021
12.	Plan Administrator's Objection to Motion to Compel and Related Filings (related document(s)[60984], [60986])	61063	March 5, 2021

STATEMENT OF ISSUES ON APPEAL

The Appellee contests the statement of issues set forth by the Appellant and will address them in briefing on the merits of the appeal.

RESERVATION OF RIGHTS

The Appellee expressly reserves, and does not waive, the right to amend, supplement, or otherwise modify the foregoing designations, and/or to object to or move to strike the items designated for inclusion in the record on appeal by other parties. This filing is made expressly subject to, and without waiver of, any and all rights, remedies, challenges, and objections.

Dated: October 7, 2022

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